

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Annual Assessment of the Status of)	MB Docket No. 12-203
Competition in the Market for the)	
Delivery of Video Programming)	

**COMMENTS OF
Somerville Community Access Television, Somerville, MA**

Somerville Community Access Television (SCATV) submits these comments in response to the above-captioned Notice of Inquiry (“NOI”), released July 20, 2012, seeking “data, information, and comment on the state of competition in the delivery of video programming.”

Somerville Community Access Television is an independent non-profit organization that produces and cablecasts programs of interest to the residents of the City of Somerville, MA. We operate one cable channel, #3, on the Comcast and RCN cable networks with funding from the cable franchise fees paid to the City by both providers. Many of our programs are produced by residents who receive training and free access to video equipment and facilities. Other programs are produced by our four staff people and other access producers in near-by towns. In Somerville, the City government operates two additional channels for government (#13 on Comcast and #22) on RCN, and education programming (15).

We are fortunate that Somerville’s access channels are on the basic tier, allowing all cable subscribers easy access to the channels. This is so important to SCATV because our

channel provides important information about local politics, community issues and events, and non-English language programs targeted to Somerville's vibrant immigrant population.

In Massachusetts PEG access is highly valued as an integral part of each community. Elected officials make extensive use of our channels to communicate about State legislation, and we provide election coverage, debates, and equal time to candidates so that the electorate can be well informed before the election. In 2011 Somerville Community Access Television produced an Alderman candidate debate in a local theater that had a live audience and was cablecast multiple times. The program won a national award for its effectiveness. Non-profit organizations use our channel to get their word out about community needs and concerns. Public access channels are the best examples of free speech and hyper-local news in the United States and they should be protected and supported. Visitors from other countries who come to the station to learn about access are envious of our ability to provide a free speech venue to all residents at no cost to them. The cable companies benefit by keeping PEG viewer subscribers who cannot get the channels over the air or on satellite. As our programs are also webcast on-demand using the cable company Internet, we believe that data service income should also be included in determining franchise fees.

PEG channels are a critical and irreplaceable resource for our community. If the Commission fails to prevent the industry practices that are occurring in other states that cause access stations to close or become less accessible to subscribers, we have little doubt that operators in Massachusetts will also adopt approaches that marginalize or effectively eliminate PEG access. Thank you for your attention to this important matter.

Wendy Blom, Executive Director

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Dated September 6, 2012